

Mason. Further, the Applicant has hereby amended claims 4, 6, 7, 8, and 11 such that the language thereof corresponds to the language of amended claim 1. Claim 5 has been canceled by this Amendment, rendering moot the rejection thereto.

The Amendment to claim 1 emphasizes the feature of the present invention whereby the motion control component operates in a translation mode in which hardware independent motion commands are converted into device-specific control commands. The claimed motion control system thus allows event tokens to be associated with motion commands that are hardware independent, and the motion control component can translate these motion commands into device-specific control commands. The user of the motion event provider is thus insulated from the operational details of the target device; these operational details are instead handled by the motion control component.

The Applicant respectfully submits that nothing in Mason discloses, teaches, or suggests the use of a motion control component as claimed. To the contrary, Mason appears to disclose a system that is entirely device specific. In particular, the Applicant respectfully submits that one of ordinary skill in the art would read Mason to presume knowledge of the nature of the target device at the time Event objects are defined.

In particular, the C++ class definitions described at the bottom of column 4 and top of column 5 of Mason indicate that the "supply" and "demand" sides of events should be separated. However, this separation does not suggest the translation mode of the motion control component as claimed. To the contrary, one of ordinary skill in the art would read Mason as reading that custom code be provided on the "demand" side as defined by a particular target device.

The Applicant thus respectfully submits that Mason does not disclose, teach, or suggest a system that provides the benefits of hardware independence provided by the claimed invention. The Applicant thus respectfully submits that Mason does not disclose or teach a motion control system having a motion control component as recited in claim 1, nor does Mason suggest that the teachings thereof be modified to be hardware independent.

Given the foregoing, the Applicant respectfully requests withdrawal of the rejection of claim 1 under 35 USC § 102(e) based on the Mason patent. The Applicant

further respectfully submits that claims 2-4 and 6-11 further define claim 1 and should be allowable over Mason for at least the same reason as claim 1.

Submitted herewith is a document (entitled Listing of All Claims and Amendments (10-15-2004)) containing a listing of the claims as currently presented. The attached Listing contains the text of each pending claim, along with any amendments made hereby (illustrated using strikethrough and underlining) and the status of each pending claim.

The Applicant respectfully submits that currently pending claims 1-4 and 6-11 are in condition for allowance, and such allowance is respectfully requested. If there is any matter which could be expedited by consultation with the Applicant's attorney, such would be welcome. The Applicant's attorney can normally be reached at the telephone number below.

Signed at Bellingham, County of Whatcom, State of Washington this 15th day of October, 2004.

Respectfully submitted,

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CERTIFICATE OF MAILING
37 C.F.R. §1.8

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being deposited with the United States Postal Service as first class mail in an envelope addressed to Mail Stop Fee Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the date shown below.

Signature: Susie Hubka

Print Name: Susie Hubka

Date: October 15, 2004